

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

WESTWIND ACQUISITION CO., LLC,)	
)	
and)	
)	
MONROE, LLC)	
)	
Plaintiffs,)	Case No. 1:09cv551
)	TSE/TRJ
v.)	
)	
UNIVERSAL WEATHER AND)	
AVIATION, INC.,)	
)	
Defendant.)	
_____)	

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiffs Westwind Acquisition Co., LLC and Monroe, LLC (collectively, "Plaintiffs"), by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56, move for partial summary judgment with respect to Count One of Plaintiffs' Complaint (Declaratory Judgment – Invalidity of Liens), and with respect to Counts One and Two of Defendant's Counterclaim (Determination and Foreclosure of Liens; Quantum Meruit). There are no material facts in dispute regarding the invalidity of the liens on Plaintiffs' aircraft, and Plaintiffs are entitled to summary judgment as a matter of law on Count One of the Complaint and to summary judgment as a matter of law dismissing Count One of Defendant's Counterclaim. Furthermore, it is undisputed that Plaintiffs do not owe any money to International Jet Management ("IJM") and are therefore entitled to summary judgment as a matter of law dismissing Count Two of Defendant's Counterclaim for Quantum Meruit. Plaintiffs rely on the accompanying Memorandum of Law, attached with the Affidavit of

William Conway, Affidavit of David Pollin, Affidavit of Mark Beesley and other exhibits, in support of their Motion.

Dated: October 5, 2009
Washington, D.C.

Respectfully submitted,

/s/

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